

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**DIGITAL TECHNOLOGIES LLC**

Plaintiff,

v.

**VALVE CORPORATION,**

Defendant.

**Civil Action No. 2:15-cv-999**

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Digital Technologies LLC (“Digital Technologies” or “Plaintiff”) files this Complaint against Valve Corporation (“Valve” or “Defendant”) alleging as follows:

**PARTIES**

1. Plaintiff Digital Technologies is limited liability company organized under the state of Texas having a principal place of business at 1400 Preston Road, Ste. 400, Plano, TX 75093.

2. Defendant Valve is a corporation organized and existing under the laws of the State of Washington with a principal place of business located at 10900 NE 4<sup>th</sup> St., Ste. 500, Bellevue, WA 98004. Defendant can be served via its registered agent for service of process: Corpserve Inc., 1001 4<sup>th</sup> Ave., Ste. 4500, Seattle, WA 98154.

**JURISDICTION AND VENUE**

3. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. Venue is proper in this district under 28 U.S.C. §§ 1391(c) and 1400(b). On information and belief, Defendant has transacted business in this district, and has committed and/or induced acts of patent infringement in this district.

5. Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Texas Long Arm Statute, due at least to its substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Texas and in this judicial district.

**U.S. PATENT NO. 8,671,195**

6. Plaintiff is the owner by assignment of United States Patent No. 8,671,195 ("the '195 Patent") titled "Digital Media Communication Protocol." The '195 Patent was duly issued on March 11, 2014. A true and correct copy of the '195 Patent is attached as Exhibit A.

7. Mr. Leigh M. Rothschild is listed as the inventor of the '195 Patent.

8. On information and belief, to the extent any marking was required by 35 U.S.C. § 287, predecessors in interest to the '195 Patent complied with such requirements.

**COUNT I  
(INFRINGEMENT OF U.S. PATENT NO. 8,671,195)**

9. Valve has, pursuant to 35 U.S.C. § 271, infringed and continues to infringe, the '195 Patent in the State of Texas, in this judicial district, and/or elsewhere in the United States by, among other things, making, using, selling, offering to sell, and/or importing, without license, a digital media communications protocol for transmitting media files between a media terminal and media node on an interactive network, such as Steam OS.

10. Valve's Steam OS falls within the scope of at least claim 17 of the '195 Patent, as evidenced by Valve's product descriptions. For example, Steam OS provides a digital communication protocol. *See http://store.steampowered.com/streaming/*. Valve's Steam OS includes at least one media terminal and media node, a communications link between them, the

communications link being initiated by Stream OS on a, the media node and terminal structured to transmit a digital file over the communications link, and the communications link is structured to bypass at least one media terminal security measure. For example, Steam OS “allows you to play a game on one computer when the game process is actually running on another computer elsewhere in your home. Through Stream, game audio and video is captured on the remote computer and sent to the player’s computer.” *Id.*

11. As a result of Valve’s infringement of the ’195 Patent, Plaintiff has suffered monetary damages in an amount not yet determined, and will continue to suffer damages in the future unless Valve’s infringing activities are enjoined by this Court.

12. Unless a permanent injunction is issued enjoining Valve and its agents, servants, employees, attorneys, representatives, affiliates, and all others acting on their behalf from infringing the ’195 Patent, Plaintiff will be irreparably harmed.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that this Court enter:

1. A judgment in favor of Plaintiff that Defendant has infringed the ’195 Patent;
2. A permanent injunction enjoining Defendant and its officers, directors, agents servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringement, inducing the infringement of, or contributing to the infringement of the ’195 Patent, or such other equitable relief the Court determines is warranted;
3. A judgment and order requiring Defendant pay to Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant’s infringement of the ’195 Patent as provided under 35 U.S.C. § 284, and an accounting of ongoing post-judgment infringement; and

4. Any and all other relief, at law or equity, to which Plaintiff may show itself to be entitled.

**DEMAND FOR JURY TRIAL**

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

DATED June 8, 2015.

Respectfully submitted,

By: /s/ Hao Ni  
Hao Ni  
Texas Bar No. 24047205  
hni@nilawfirm.com  
Timothy T. Wang  
Texas Bar No. 24067927  
twang@nilawfirm.com  
Neal G. Massand  
Texas Bar No. 24039038  
nmassand@nilawfirm.com  
Stevenson Moore V  
Texas Bar No. 24076573  
smoore@nilawfirm.com

**Ni, Wang & Massand, PLLC**  
8140 Walnut Hill Ln., Ste. 500  
Dallas, TX 75231  
Tel: (972) 331-4600  
Fax: (972) 314-0900

**ATTORNEYS FOR PLAINTIFF**  
**DIGITAL TECHNOLOGIES LLC**